# PURPOSE:

This document outlines the policy and procedures governing the retention and disposition of records related to grants and sponsored programs conducted under the auspices of CSU Channel Islands (CSUCI) and its auxiliaries. This makes reference to existing federal (2 CFR 200) and CSU guidelines as well as CSUCI’s fiscal records policy. This policy identifies and records responsibilities of the following units/persons: Research & Sponsored Programs (RSP), Business & Financial Affairs/Financial Services, principal investigators (PIs), and staff (subsequently referred to as “Staff”) assigned to assist principal investigators with sponsored projects.

RSP follows regulations contained in federal regulations pertaining to the retention and access requirements for records associated with grants and sponsored programs. Following the project closeout process, RSP and others identified herein are responsible for records retention of documents for three years from the date of submission of the final expenditure report, unless the award terms and/or sponsor policy specify an extended period.

# BACKGROUND:

This policy is required per the Sponsored Programs Management of Reports and Technical Data policy issued by the Office of the Chancellor. This policy applies to RSP and specifies other custodians with responsibility for maintaining records pertaining to sponsored programs at CSUCI. The policy specifies the period of time and indicates who is responsible for each type of record. The policy includes the role of PIs in maintaining scientific and technical reports and notifying RSP when they submit those reports to funding agencies.

# POLICY:

## Accountability:

Research & Sponsored Programs (RSP)

Business & Financial Affairs/Financial Services (BFA)

Principal Investigators and Staff

California State University Channel Islands Foundation

## Applicability:

RSP, California State University Channel Islands Foundation and other administrative units that have responsibility for externally sponsored awards.

Faculty and staff who have post-award responsibility for sponsored programs.

## Definitions:

Custodian: The title of the campus-designated department head who maintains the official/original copy of the record/information. Retention schedules should specifically identify the campus-designated custodian responsible for identified records/information.

Disposition: A range of processes associated with implementing records/information retention, destruction, or transfer decisions that are documented in the records/information retention and disposition schedule or other authority.

Staff: Staff includes all employees who are not instructional faculty personnel (including librarians, coaches, and counselors). For purposes of this policy only, staff is defined as those staff members who are assigned to assist the PI with post-award administration of a grant or sponsored program.

PI: Principal Investigator identifies the individual (whether referred to in the Contract or Grant as a Principal Investigator, Project Director, or other similar term) designated by the Sponsored Program Administrator to be responsible for ensuring compliance with the academic, scientific, technical, financial and administrative aspects and for day-to-day management of the Sponsored Program.

Project (or award): Grant or sponsored award, identified by number, funded by an agency external to the university.

Record/Information: Every means of communication or representation related to a grant or sponsored program to include physical and electronic documents or other means to engage in business, regardless of media.

Retention Period: The period of time that a record/information shall/should be kept. This period may be divided into:

* Active Retention Period – This is the length of time the records or information are to remain available for immediate retrieval to meet operational needs.
* Inactive Retention Period – This is the length of time the records or information are to be retained to meet the long-term needs of the campus/CSU.

Record Value: The worth, merit, or importance of a record or information pertaining to one or more of the following areas (based on the CSU Records Retention Policy):

* Operational: required by a campus or unit to perform its primary function.
* Legal: required to be kept by law, litigation, or government investigation.
* Fiscal: related to the financial transactions of a university, especially those required for audit or tax purposes.
* Historical: of long-term value to document past events. This may arise from exceptional age and/or connection with some significant historical event or person associated with the CSU and/or CSUCI.
* Vital: critical to maintain to ensure operational continuity for the CSU and/or CSUCI after a disruption or disaster. Vital records or information may fall into any one of the above value categories.

## Text:

### RSP Records Retention and Disposition

California State University Channel Islands (CSUCI) Research & Sponsored Programs (RSP) records retention is distributed by function among the various offices involved in managing sponsored programs. Below is a breakdown of records retention by office.

Research & Sponsored Programs (Project File):

* Project file created immediately upon award notification includes a copy of the award instrument, approved proposal and budget, and pre-award institutional approvals/certifications/assurances for the application submitted to the sponsor.
* RSP maintains the Project file in the RSP office for the life of the project that includes additional documents such as: any award modifications/amendments, budget revisions, PI meeting checklist, and other important non-financial compliance documentation. This documentation is retained for a minimum of three years following the submission of the final expenditure report, or as long as required by the sponsor.
* Files may be kept for a longer period of time when required by the sponsor (for example, non-governmental sponsors typically require documentation to be kept for a period of 7 years following project closure). After three years (or after sponsor-specified timeframe), records are removed and processed for destruction.

California State University Channel Islands Foundation (Program File):

* + Responsible for maintaining records in accordance with the CSUCI records retention schedule and policy for any California State University Channel Islands Foundation sponsored program records.
  + Responsible for passing on all documentation (incoming and outgoing) to stateside departments and for ensuring retention of relevant pre-award and post-award non-financial documents.

Business & Financial Affairs/Financial Services (Financial File):

Copies of all grant-related financial reports are retained by Financial Services for a minimum period of three years following the submission of the final expenditure report, or as long as required by the sponsor.

* Financial supporting documentation received for expenses billed to grants are retained for a minimum period of three years following the submission of the final expenditure report, or as long as required by the sponsor.
* Copies of all signed grant effort reports and cost match documentation are held for a minimum period of three years following the submission of the final expenditure report, or as long as required by the sponsor.
* Grant close-out documentation is maintained by Financial Services are held for a minimum period of three years following the submission of the final expenditure report, or as long as required by the sponsor.

Departmental Level (Program File):

*Principal Investigators/Faculty*:

* PI’s are responsible for maintaining copies of their scientific or technical reports, research records (lab notes, data, etc.) and are responsible for notifying RSP and BFA when they submit their reports or deliverable to sponsors.
* PI’s must notify RSP when they submit technical or scientific reports to sponsors, and must provide RSP with evidence of submission.
* PI’s are responsible for maintaining all programmatic files, specific compliance documentation (i.e., IRB approvals, Environmental Health & Safety approvals, etc.), and back-up justification documentation for expenses billed to awards for a minimum period of three years following the submission of the final report, or as long as required by the sponsor.
* If a PI leaves the University prior to the end of the retention period, disposition of the PI’s grant records will be decided during the PI transfer process.

Assigned Project Staff (Program File):

* Back-up justification documentation received for expenses billed to grants are retained by the PIs academic program area or department for a minimum period of three years following the submission of the final expenditure report, or as long as required by the sponsor.
* *For sponsored projects that have a temporary Staff position funded by the grant:* All documentation of expenses billed to grants will be transferred to the departmental level (for research grants) or designated AVPs office (for institutional grants or multi-departmental grants) upon closure of the grant.

The following dispositions apply to all grants and contract records:

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|  | **Type of record** | **Filing and disposition** |
| 1 | Grant and Contract active award files | Maintained in RSP (and/or California State University Channel Islands Foundation when appropriate) for the entire performance period of the project. |
| 2 | Grant and Contract closed project files | Kept in RSP (and/or California State University Channel Islands Foundation when appropriate) storage for three years from the date of closing (or longer if required by sponsor). |
| 3 | Grant and Contract financial reports | Maintained in Financial Services for three years from the date of closing (or longer if required by sponsor). |
| 4 | Grant and Contract expense back-up and justification documentation | Maintained by the PI and assigned project Staff for three years from the date of closing (or longer if required by sponsor).  If the assigned Staff position is temporary, then files are transferred to the area or designated AVP’s office upon closure of the grant. |
| 5 | Grant and Contract research documentation (lab notes, data records, etc.), scientific & technical reports. | Maintained by the PI in area files. |
| 5 | Contract and Grant closed project files after three years from the date the final expenditure report is delivered (unless otherwise required by the sponsor). | Destroyed following administrative guidelines for disposition of administrative records after the date of the final expenditure report is delivered. |

### Institutional Review Board (IRB)

IRB records include copies of all research protocols and approved informed consents, adverse reaction reports and documentation of IRB review, reports of adverse events, serious unanticipated problems, non-compliance issues, suspension or termination of IRB approval, protocol violations, and protocol deviations if serious and/or continuing or deliberate.

IRB records shall be retained for at least three years after completion of the research (or longer if required by sponsor). Copies of IRB approvals should be retained a) by the PI, b) in the grant award file, and c) in the IRB files.

# EXHIBIT(S):

# [Sponsored Programs Management of Reports and Technical Data](https://calstate.policystat.com/policy/8543276/latest/)

[CSU Executive Order 1031](https://calstate.policystat.com/policy/6594392/latest/)